

EDOK Criminal Complaint (Revised 6/13)

United States District Court
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRYSTAL MARIE HAWORTH

Defendant.

CRIMINAL COMPLAINT

Case No. 21-MJ-231-KEW

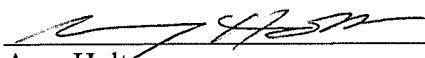
I, Amy Holt, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about July 15, 2020, in the Eastern District of Oklahoma, in Indian Country, **CRYSTAL MARIE HAWORTH** committed the crime of Murder in Indian Country, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Special Agent Amy Holt, which is attached hereto and made a part hereof by reference.)

☒ Continued on the attached sheet.




Amy Holt
Special Agent
Federal Bureau of Investigation
Complainant

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: May 6, 2021

UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer



Signature of Judicial Officer



AFFIDAVIT

Amy Holt, being duly sworn, does depose and state the following:

AGENT BACKGROUND AND INTRODUCTION

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI). I am an investigative officer, or law enforcement officer, of the United States of America within the meaning of Title 18, United States Code, Section 2510(7), that is an officer of the United States who is empowered by law to conduct investigation of, and make arrests for, offenses enumerated in Title 18. In the course of my duties as special agent, I have investigated criminal violations related to Indian Country crimes, as explained in 18, United States Code, Section 1151 and as it pertains to the Major Crimes Act (MCA).

2. I have been employed as a Special Agent of the FBI since 2020. I am currently assigned to the Oklahoma City Division, Muskogee Resident Agency. In connection with my official duties, I am charged with investigating violations of federal criminal laws. I have a Bachelor of Science degree in Civil Engineering. Prior to my employment with the FBI I worked for the Department of Defense for eight years.

The following is true to the best of my knowledge and belief:

PROBABLE CAUSE

3. VENUE: the facts and circumstances alleged in this affidavit occurred within the Eastern District of Oklahoma. More specifically, the facts and circumstances occurred within the special maritime and territorial jurisdiction of the United States and in Indian Country, to wit the Choctaw Nation Reservation.

4. DEFENDANT: The defendant is CRYSTAL MARIE HAWORTH (HAWORTH). For the purposes of federal jurisdiction, HAWORTH is an Indian and is an enrolled member of the Cherokee Nation with some degree of Indian blood.

5. VICTIM: The victim of the below-noted offense is Leonard Brokeshoulder (BROKESHOULDER).

6. OFFENSE: On or about July 15, 2020, HAWORTH killed BROKESHOULDER. HAWORTH did this within the Eastern District of Oklahoma, within the special maritime and territorial jurisdiction of the United States and within Indian Country—the Choctaw Reservation, in violation of Title 18, United States Code, 1111(a), 1151, and 1153 Murder in Indian Country.

7. BACKGROUND: On or about July 15, 2020, McAlester Police Department Officers reported that HAWORTH had driven to Pittsburg County Sheriff's Office, walked in covered in blood and told Pittsburgh County Jailers that there was an injured male at 613 West Polk Avenue, McAlester, Oklahoma 74501.

8. Pittsburg County Sheriff's Office and McAlester Police Officers responded to 613 West Polk Avenue, McAlester, Oklahoma 74501. Responding officers found a male, later identified to be BROKESHOULDER, lying on the kitchen floor covered in blood. Medics were dispatched to the scene and pronounced BROKESHOULDER dead. Responding officers reported that BROKESHOULDER suffered numerous stab wounds to the torso and face along with a cut to his neck which nearly decapitated him. The Medical Examiner's Report indicates the cause of death was multiple sharp force injuries and notes numerous stab wounds to the neck, head, torso, and hands of BROKESHOULDER.

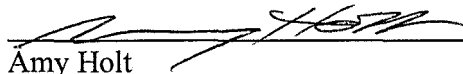
9. McAlester Police Department Officers interviewed HAWORTH at the Pittsburg County Sheriff's Office. HAWORTH was read her Miranda Rights and agreed to speak with the

interviewing officers. HAWORTH stated numerous times that she had tried to cut off BROKESHOULDER's head and kill him. HAWORTH also stated that she had been living with BROKESHOULDER for the past few months. HAWORTH stated that she and BROKESHOULDER had several arguments where she had thought about killing BROKESHOULDER. HAWORTH went on to state that she and BROKESHOULDER were engaged to be married and that she planned to marry him, then kill him and take all of his property.

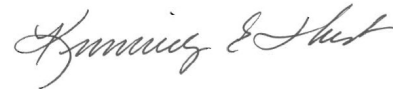
10. The facts presented in this affidavit are not a complete recitation of all the facts known to law enforcement, rather, the affidavit is solely offered to establish probable cause for the crime presented in this affidavit.

11. Based on a review of those documents and based on my knowledge and experience with violent crimes in Indian country, I, as your Affiant have probable cause to believe Crystal Marie HAWORTH has committed the offense of Murder, the unlawful killing of a human being with malice aforethought, in Indian Country in violation of Title 18 United States Code, Sections 1111(a), 1151, and 1153.

Respectfully submitted,


Amy Holt
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 6th day of May, 2021.


United States Magistrate Judge